Application Number 10/687,989
Amendment dated September 10, 2008
Response to Office Action mailed June 10, 2008

REMARKS

This amendment is responsive to the Office Action dated June 10, 2008. Applicant has amended claims 1, 5, 7, 8, 14, 16, 18, 27, 30, 33, and 34. Applicant has cancelled claims 2, 4, 29, and 36. Claims 1, 5–16, 18–27, 30–35, and 37–41 are pending.

Claim Objections

In the Office Action, the Examiner objected to claim 4 and 29. Applicant's cancellation of claims 4 and 29 renders this objection moot. Therefore Applicant respectfully requests removal of this objection.

Claim Rejection Under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claim 7 under 35 U.S.C. § 103(a) as being unpatentable over Guerrero et al. (US 2003/0188018, hereinafter "Guerrero") and Craig Hunt, "TCP/IP Network Administration," 1997 (hereinafter, "Hunt"). The Examiner also rejected claims 1, 2, 4, 8–13, 15, 16, 18–27, 29 and 31–44 under 35 U.S.C. § 103(a) as being unpatentable over Guerrero in view of Pillay-Esnault (US 7,334,047, hereinafter "Pillay-Esnault"), and Hunt. The Examiner further rejected claims 5, 6, 14 and 30 under 35 U.S.C. § 103(a) as being unpatentable over Guerrero in view of Pillay-Esnault and Hunt, and in further view of Rochberger et al. (US 6,212,188, hereinafter "Rochberger"). Applicant respectfully traverses the rejection to the extent such rejections may be considered applicable to the claims as amended. The applied references fail to disclose or suggest the inventions defined by Applicant's claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

For example, Applicant's independent claim 1 as amended requires maintaining a count of routes exported from the exterior routing protocol executing on the network device to the interior routing protocol executing on the network device and rejecting additional routes exported from the exterior routing protocol to the interior routing protocol when the count exceeds the export limit set by the command. The amendments to claim 1 clarify that claim 1 requires maintaining a count of routes exported from an exterior routing protocol executing on a network device to an interior routing protocol executing on the same network device. Furthermore, the

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amendments to claim 1 clarify that claim 1 requires rejecting additional routes exported from the exterior routing protocol to the interior routing protocol when the count exceeds an export limit.

The Office Action cited Guerrero in view of Pillay-Esnault and Hunt in support of the rejection of claim 1. These applied references fail to disclose the requirements of Applicant's claim 1 as amended. For example, Guerrero and Pillay-Esnault are not at all directed to exporting routes from an exterior routing protocol executing on a network device to an interior routing protocol executing on the same network device. Instead, Guerrero is directed to counting a number of addresses advertised to a network device from a different network device. Moreover, Guerrero describes counting the number of addresses advertised to a network device from a different network device for a single protocol, such for a link state routing protocol. For example, Guerrero states, "The lookup table modification device 10 may receive an update instruction from other routers/switches and instruct the selected section modifier module 16 to update a selected lookup table memory section." Guerrero, ¶ [0027] (emphasis added). Similarly, Pillay-Esnault states, "The hub router interface that need to leak full vision of the area topology to a spoke router may be configured with have [sic] a command to leak all LSA for the area." Pillay-Esnault, col. 9, ll. 54–57.

Rather than disclosing exporting routes from an exterior routing protocol executing on a device to an interior routing protocol executing *on the same device*, Guerrero and Pillay-Esnault each disclose advertising routes from one network device to a *separate* network device for the *same routing protocol*. Thus, neither Guerrero nor Pillay-Esnault even address the issue of routes exported between two different network protocols, let alone two different network protocols executing on the same device. Thus, the references to not teach or suggest the requirements of Applicant's claim 1 as amended, which requires maintaining a count of routes exported from the exterior routing protocol executing on the network device to the interior routing protocol executing on the network device and rejecting additional routes exported from the exterior routing protocol to the interior routing protocol when the count exceeds the export limit set by the command.

The Office Action stated that it would have been obvious for one of ordinary skill in the art to combine the teachings of Guerrero and Pillay-Esnault with Hunt to arrive at the requirements of Applicant's claim 1. Applicant respectfully disagrees that one of ordinary skill

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in the art would have found a reason to combine Guerrero with Pillay-Esnault and Hunt. However, even if one of ordinary skill in the art had combined the teachings of the applied references, one would still not arrive at the requirements of Applicant's claim 1 as amended.

As noted above, Guerrero and Pillay-Esnault are directed to advertising routes between devices within the same routing protocol. Moreover, Hunt does not provide any teaching that would allow one of ordinary skill in the art may modify, for example, a router that exports routes to different routers in accordance with a single routing protocol (as taught by Guerro and Pillay-Esnault) to somehow achieve Applicant's claim.

For example, assuming for the purpose of this discussion that one of ordinary skill in the art had combined the disclosures of Guerrero, Pillay-Esnault, and Hunt, the combination would yield a networking device that could count a total number of addresses in a lookup table and reject an instruction to add an address to the lookup table when the lookup table is full. Because counting module 20 of Guerrero only tracks the size of lookup table 8, Guerrero fails to maintain a count of routes from a particular source, i.e. from an external routing protocol executing on a network device to an internal routing protocol executing on the same device. Hunt and Pillay-Esnault similarly fail to disclose maintaining a count specifically for routes exported from an external routing protocol executing on a networking device to an internal routing protocol executing on that same networking device.

Similarly, none of the applied references disclose a method to reject additional routes exported from an external routing protocol executing on a network device to an internal routing protocol executing on the same network device when the count exceeds an export limit. Guerrero may teach rejecting additions to a lookup table, but Guerrero fails to disclose rejecting additional routes exported from an external routing protocol to an internal routing protocol. To the extent that Pillay-Esnault discloses filtering, Pillay-Esnault is limited to blocking certain types of link state advertisements (LSAs). Pillay-Esnault says nothing of an export limit or any sort of numerical limit that could achieve the requirements of Applicant's claim 1 as amended. Hunt is not in any way directed to rejecting additional routes. Accordingly, Guerrero in view of Pillay-Esnault and Hunt fails to teach, suggest, or disclose the requirements of Applicant's claim 1 as amended.

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Applicant's independent claims 7, 8, 11, 27, 33, 34, and 37 as respectively amended include requirements similar to maintaining a count of routes exported from the exterior routing protocol executing on the network device to the interior routing protocol executing on the network device. Applicant's independent claims 7, 8, 11, 16, 18, 27, 33, 34, and 37 as respectively amended include requirements similar to rejecting additional routes exported from the exterior routing protocol to the interior routing protocol when the count exceeds the export limit set by the command. Respective similar arguments may therefore apply with respect to these independent claims.

Independent claim 1 as amended additionally requires receiving a command from a client to specify an export limit for routes exported from an exterior routing protocol executing on a network device to an interior routing protocol executing on the network device. The Office Action acknowledged that Guerrero lacks such a command, but cited Pillay-Esnault as disclosing a similar command. However, Pillay-Esnault discloses a command that enables or disables *filtering of LSAs by type of LSA*. Claim 1 as amended, on the other hand, requires receiving a command to specify an export limit for routes. The command taught by Pillay-Esnault does not specify any form of an export limit for routes exported from an exterior routing protocol executing on a network device to an interior protocol executing on the network device. Accordingly, Guerrero in view of Pillay-Esnault and Hunt fail to disclose this requirement of Applicant's claim 1. Applicant's claims 10, 11, 16, 18, 27, 32, 33, 34, and 37 include requirements similar to receiving a command to specify an export limit as required by Applicant's claim 1, therefore similar arguments apply with respect to these claims.

For at least these reasons, the applied references fail to obviate the requirements of Applicant's independent claims 1, 7, 8, 11, 16, 18, 27, 33, 34, and 37. Of course, the claims dependent upon these independent claims, i.e. claims 5, 6, 9, 10, 12–15, 19–26, 30–32, 35, and 38–41, incorporate the requirements of the respective base claims. Therefore claims 5, 6, 9, 10, 12–15, 19–26, 30–32, 35 are likewise patentable. Moreover, the dependent claims include a number of requirements that the applied references likewise fail to disclose.

For example, claim 5 as amended requires updating routing information to associate the routes with a maximum metric that defines a maximum distance from the network device to neighboring network devices when the count exceeds the export limit and advertising the

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updated routing information to a network device. The amendment to claim 5 clarifies that a maximum metric is a maximum distance from the network device to neighboring network devices. The Office Action correctly noted that Guerrero, Hunt, and Pillay-Esnault fail to disclose these requirements, but cited Rochberger as disclosing this requirement.

However, Rochberger similarly fails to disclose the requirements of claim 5 as amended. The cited portion of Rochberger (col. 5, ll. 30–35) discloses an "overload node" that cannot perform routing, with the exception of local routing to local users. Rochberger says nothing of a maximum metric that defines a maximum distance from the network device to neighboring network devices. Accordingly, the applied references fail to disclose the requirements of claim 5 as amended. Claims 14 and 30 as amended include similar requirements, therefore similar arguments apply to amended claims 14 and 30.

Claim 9 requires maintaining respective counts for instances of the interior routing protocol, identifying one of the instances of the interior routing protocol to which the routes were exported, comparing the respective count for the identified one of the instances, and rejecting additional routes exported to the interior routing protocol to the identified one of the instances based on the comparison. As discussed above, the applied references fail to disclose maintaining a count of routes exported from an external routing protocol executing on a network device to an internal routing protocol executing on the network device. Therefore, the applied references necessarily fail to disclose maintaining respective counts for instances of the interior routing protocol. Moreover, for similar reasons as those presented above, the applied references necessarily fail to disclose comparing the respective count and rejecting additional routes to an identified one of the instances based on the comparison. Claims 25, 31, and 33 includes similar requirements, therefore similar arguments apply with respect to claims 25, 31, and 33.

For at least these reasons, the Office Action fails to establish a prima facie case for non-patentability of Applicant's claims 1, 5–16, 18–27, and 30–35, and 37–41, as respectively amended, under 35 U.S.C. § 103(a). Applicant therefore respectfully requests withdrawal of this rejection.

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CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

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September 10, 2008
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